

# Letter 1

PAONIA RANGER DISTRICT  
ACTION \_\_\_\_\_ DATE \_\_\_\_\_

MAY 28 2003

DISTRICT RANGER  
MINERALS LM  
LANDS/ENG  
RANGE  
WILDLIFE  
GDA  
DBM/DBM ASST  
LEO  
TIMBER

Shari Dangremond  
P.O. Box 1266  
Paonia, Colorado 81428

Project Manager GEC Exploration Drilling Project  
P.O. Box 1030  
Paonia, Colorado 81428

Dear Project Manager:

I really don't appreciate your hypocrisy in causing the mailing to everybody 2 giant notebooks of information, which nobody can possibly read all of, to make it look as though you are actually interested in the public opinion of your projects. We all know by now that GEC is only interested in forcing coal bed methane down everybody's throats, even though the majority of Delta County residents are opposed, as you well know.

It is true that we live in a society which has chosen to elevate extreme materialism & consumption above all other values. The Bible and virtually every other human spiritual belief system warns against the danger of this kind of hubris, but our civilization is blind. I feel sorry for people like GEC, who are helping to ensure that there is no quiet, peaceful place left on the face of the earth, and who do not value land as God created it, rather than totally manipulated by the hand of mankind, with its limited vision, and inability to assess the long term ramifications of such shallow and ultimately unfulfilling values of industrial and material development over all.

I do all I can to conserve (Thanks, but No Thanks,  
Shari Dangremond

# Letter 2

PACONIA RANGER DISTRICT  
ACTION \_\_\_\_\_ DATE \_\_\_\_\_

JUN 13 2003

DISTRICT RANGER  
MINERALS LM  
LANDS/ENG  
RANGE  
WILDLIFE  
ADMIN ASST  
FED  
STATE

June 9<sup>th</sup>, 2003

Project Manager  
GEC Exploration Drilling Project  
P.O. Box 1030  
Paonia, CO 81428

RE: Supporting Approval of GEC Exploration Application

Dear Project Manager:

I have reviewed the Environmental Assessment for the GEC Exploration Drilling Project and my recommendation would be that all eight exploratory wells be allowed to proceed. If the gas reserves prove economically viable, a more in-depth Environmental Impact Statement will be in order.

I would like to add a few comments regarding the mitigation:

2-1

1. On table 2-8 (page 2-26) the report states "No Impact to groundwater resources ...", yet Potential Additional Mitigation suggest three costly remedies in WR-5, WR-6 and WR-12. I do not support high cost mitigation for non impacts. I would suggest low cost "best practices" solutions that are cost effective in regards to environmental protection.

2-2

2. In the Air Quality section, the report is over stating the potential effects eight exploratory wells may have on air quality. The proposed additional mitigations might be more appropriate in the future EIS if full development is economically feasible. I would hope the federal agencies will work with GEC on low cost alternative on Air Quality in light of the EA's finding that "quantities are expected to be quite low and below required reportable values".

2-3

In closing, I would like to state my support for the President's Energy Plan (Executive Order #13212). This proposed exploration project fits with our Nation's need for new domestic sources of energy. I hope you will approve the application with limited additional mitigation which is cost effective in regards to findings of no or limited impacts.

Sincerely,



Fred Eggleston

## Letter 3

PAONIA RANGER DISTRICT  
ACTION \_\_\_\_\_ DATE \_\_\_\_\_

JUN 11 2003

June 9<sup>th</sup>, 2003

Project Manager  
GEC Exploration Drilling Project  
P.O. Box 1030  
Paonia, CO 81428

DISTRICT RANGER \_\_\_\_\_  
MINERALS LM \_\_\_\_\_  
LANDS/ENG \_\_\_\_\_  
RANGE \_\_\_\_\_  
WILDLIFE \_\_\_\_\_  
COA \_\_\_\_\_  
IRM/DBM ASST \_\_\_\_\_  
RCI \_\_\_\_\_  
HABER \_\_\_\_\_

Dear Project Manager:

- 3-1 [ I appreciate all the work both federal agencies have put into this review of the exploratory wells. This project seems ready to go forward.
- 3-2 [ In light of the President's Energy Plan and our need for domestic supplies of energy, I encourage the governing federal agencies to allow GEC to go forward with all eight exploratory wells.
- 3-3 [ From the report, I did note that "Potential Additional Mitigation" were a bit strong in areas where the report stated little or no impacts. I hope the federal agencies will look at cost benefits in relations additional mitigation. No need forcing more cost on GEC if we will realize no environmental benefits.
- 3-4 [ The report also down plays the economic benefit this project will provide the local Delta economy. Venders, drill service companies, as well as Delta's hospitality industry will experience an economic up swing from the project.
- 3-4 [ Please approve the exploratory project with all eight wells. If oil and gas development is economically feasible in Delta County, I understand even more environmental review will take place with the benefit of information provide by the eight proposed wells.

Thanks you for you time and consideration.

Sincerely,



Olive Hammond  
Grand Junction, Colorado

## Letter 4

June 10, 2003

Project Manager  
GEC Exploration Drilling Project  
P.O. Box 1030  
Paonia, CO 81428

Dear Project Manager:

After seeing Federal Reserve Chairman Alan Greenspan's comments on the news on June 10<sup>th</sup>, I would like to add to my comment letter dated June 9<sup>th</sup>.

4-1 It seems the price of Natural Gas has doubled since last year and is now having dramatic effects on the U.S. economy. Now more than ever, the United States needs more supplies of domestic energy. The Government has been promoting the use of natural gas as a clean fuel alternative, but exploration and development of natural gas on public lands has actually declined because of permitting issues on public lands.

4-2 [ The EA states “no impacts” on the major environmental issues such as air and water. Allow GEC to go forward with all eight wells with limited mitigation appropriate to the environmental impacts. I would support rejection of all proposed additional mitigations suggested in the EA.

It is critical for our country and for our economy that natural gas exploration move forward as quickly as possible.

Thank you again for the opportunity to comment.

Sincerely,

Wive Hammond

Olive Hammond  
Grand Junction, Colorado

PAONIA RANGER DISTRICT  
ACTION DATE

JUN 12 2003

DISTRICT RANGER  
MATERIALS *LM*  
LANDING

## Letter 5

Shanna Koenig•PO Box 464•Frisco•CO•80443

June 13, 2003

Project Manager  
GEC Exploration Drilling Project  
P.O. Box 1030  
Paonia, CO 81428

Dear Sir,

5-1

I recently heard an NPR program that featured Alan Greenspan talking about the lack of domestic energy sources and specifically natural gas as having the potential to slow our economic growth. While I know that the gas exploration in western Colorado will not immediately contribute to fixing this problem I feel it is important that we allow gas exploration on our federal lands to proceed. Certainly there are places where exploration should not take place and situations where gas recovery is too damaging to the environment. However, the National Forest and BLM lands in western Colorado were designated for multiple uses including oil & gas leasing. In fact, page 1-6 of the Assessment references the Oil & Gas Leasing Final EIS in 1993. My reading of the Assessment reveals that there will be minimal impacts from this specific exploration project. While this exploration, if successful, will not alleviate our country's natural gas shortage it is important that we allow environmentally sound exploration and production to occur.

5-2

Table 2-8 jumps out at me as having the potential to halt or make exploration very expensive. While the Assessment concludes that there will be very little to no impact on surface and groundwater WR-12 on page 2-64 is a solution to a problem that does not exist. To include this requirement logically means that there will have to be mitigations to any possible impact the exploration will have. I think these mitigations are not needed.

Sincerely,



Shanna Koenig

PAONIA RANGER DISTRICT  
ACTION DATE

JUN 19 2003

DISTRICT RANGER  
MINERALS ☒ *LM*  
LANDS/ENG  
RANGER  
WILDLIFE  
GEOL  
PLANT/ANIMAL ASST  
LEO  
TIMBER

# Letter 6

PAONIA RANGER DISTRICT  
ACTION \_\_\_\_\_ DATE \_\_\_\_\_

JUN 20 2003

June 17, 2003

Project Manager  
GEC Exploration Drilling Project  
PO Box 1030  
Paonia, CO 81428

DISTRICT RANGER \_\_\_\_\_  
MINERALS \_\_\_\_\_  
LANDS/ENG \_\_\_\_\_  
RANGE \_\_\_\_\_  
WILDLIFE \_\_\_\_\_  
GDA \_\_\_\_\_  
OBM/DRILL ASST \_\_\_\_\_  
LEO \_\_\_\_\_  
CIMBE \_\_\_\_\_

Re: Environmental Assessment  
Gunnison Energy Corporation's Proposed Exploratory Gas Drilling Project  
Grand Mesa and Gunnison National Forests

Dear Ms. Mattson:

I understand that you will take my comments into consideration before making a decision on the above-referenced project. I have read the Environmental Assessment and have these observations, concerns and suggestions.

I believe that the Forest Service:

- 6-1 [ • Shouldn't grant exceptions to lease stipulations. Do not allow requested exceptions for Leon Lake #4 and #5 (Page 3.4-17). I'm sure that the Forest Service has good reasons for the rules about roads and wells not being located near bodies of water and streams.
- 6-2 [ • Shouldn't allow drilling before:
  1. A survey of bird populations is performed. Do not allow drilling activity between February 1 and July 16 within ½ mile of golden eagle nests. (Page 3.6-23). Obtain mitigation for the deleterious effects on bald eagles due to water taken from the North Fork of the Gunnison for the project. (Page 3.7-17) Identify purple martins' nests and require adjustments to the well sites and roads as necessary (Page 3.7-10)
  - 6-3 [ 2. The hydrology report performed by the Colorado School of Mines is completed. In your Assessment it is stated, "The impact of hydro fracturing depends largely on two factors: 1) the structural grain of the rocks being hydrofractured and 2) the stress field operating on the rocks at the time of the hydro fracturing. Neither of these factors is known for the Mesaverde Formation in the project area." (Page 3.4-19) Do not gamble with our watershed before having the facts.
  - 6-4 [ 3. A survey of recreational activities is completed to gauge the effects of the wells. (Page 3.8-6).
  - 6-5 [ 4. A survey during the growing season to survey sensitive plants is complete (Page 3.7-25).
  - 6-6 [ 5. An insect and disease survey is complete. Areas of the state are already infested and diseased due to stress from drought. As the assessment states, "There is increased potential for insect and disease

## Letter 6 Continued

- 6-6 attacks due to stress and the opening of pathways for infection.” (Page 3.5-10)
- 6-7 6. Local volunteer fire departments are trained in fighting drill site and forest fires. (Page 3.13-6)
- 6-8 7. Inconsistencies of the Environmental Assessment are corrected and the public given a chance to review the corrections. Examples: view shed table, alternative truck routes, water impacts and regulation of fracing fluids (Page 2-52)
- 6-9
- Shouldn’t allow drilling during elk calving. As the report states, the “dispersed human activities in these areas might cause substantial declines in the elk reproductive success.” (Page 3.16-14)
  - The Forest Service and BLM should provide on-site personnel to:
    1. Monitor the operator’s compliance with agency drilling requirements.
    2. Monitor the operator’s compliance with your noxious weed policy. Specifically the trucks must be cleaned before entering the project area. (Page 3.5-9)
    3. A Forest Service archeologist should be on site to monitor the disturbance of the site. (Page 3.11-5) It is clear that the Grand Mesa was used by Indians for up to 50 centuries and that important fire rings and artifacts have been discovered there (source – Byway DVD played at the Welcome Center). The operator is not qualified to recognize cultural material.

I hope that you will do the right thing and modify your decision based on the valid input you receive.

Sincerely,



Peggy Baxter  
1869 – 2375 Road  
Cedaredge, Colorado 81413  
856-6225

cc: Representative Scott McInnis  
Senator Wayne Allard  
Senator Ben Nighthorse Campbell  
Representative Mark Udall

# Letter 7

Project Manager  
GEC Exploration Drilling Project  
P.O. Box 1030  
Paonia, CO 81428

June 17, 2003

Thank you for granting us the opportunity to comment on the EA prepared pursuant to the Gunnison Energy applications to drill eight exploratory wells for the potential production of methane gas.

The report appears to be comprehensive, informative, and well prepared. We have read it thoroughly. We believe we have a grasp of the concepts and procedures, and the considerable impacts this activity will have on our community.

7-1 [ For the eight exploratory wells, the negative impacts imposed on the general area and specific sites are well documented in the report, and are considerable in scope. We understand that the subject wells would be drilled on existing gas leases that allow such action. However, the approvals needed for lease exceptions, ROW's, and offsite road construction and modification will serve to facilitate implementation. The door is being opened.

7-2 [ We believe strongly that the EA is deficient in that it suggests that eight exploratory wells, in contrast to any future production wells, are mutually exclusive. They are not. Successful exploration wells beget productions wells, and with the abundance of methane encountered in the West Elk coal mines, new wells drilled to a depth of 2,500 – 5,000 feet will likely prove out the presence of production grade reserves. The cumulative affect of unknown numbers of wells and pipelines that could follow would be monumental and suggest a disastrous result to the North Fork Valley. Although future drilling would clearly need approval, the precedent would have already been set.

Drilling exploratory wells took place years ago in the Powder River Basin in Wyoming, which is now degraded with thousands of methane wells, pipelines, with thousands of additional wells planned. We have read recently that 12,000 wells are in place there, with 39,000 on the drawing boards. Could this be possible? How many wells in the North Fork Valley are too many? Eight, 25, 100, 1000? The three year drilling program scheduled for the proposed activity could easily be extended to 10 – 20 years or more. Gunnison Energy is not in this for eight wells.

7-3 [ Prudent planning by the U.S. Forest Service, the BLM, and Delta and Gunnison Counties would call for a regional land use plan in advance of a single exploratory well being authorized that is not legally permitted without lease modification. This plan should govern all surface energy exploration and development, and have received all jurisdictional approvals after adequate opportunity for public input.

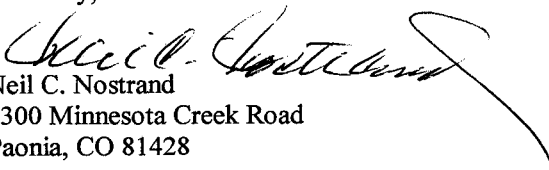
## Letter 7 Continued

7-4

To ask the public to buy off on these eight wells with no comment on the cumulative affect of as yet unknown and unlimited future drilling is unjust. Political pressure notwithstanding, all parties should step back and concentrate on what we all want the North Fork Valley to look like in 20 years. In the meantime, Gunnison Energy should be put on notice not to expect perfunctory approval of any application, now or in the future, that is not already legally permitted.

Please, let the legacy of our current public land officials show in the future that profits were not placed ahead of the people, the land, the wildlife, and our communities.

Sincerely,

  
Neil C. Nostrand  
6300 Minnesota Creek Road  
Paonia, CO 81428

**PAONIA RANGER DISTRICT**  
**ACTION** **DATE**

JUN 19 2003

DISTRICT RANGER \_\_\_\_\_  
MINERALS ☒ LM  
LANDS/ENG \_\_\_\_\_  
RANGE \_\_\_\_\_  
WILDLIFE \_\_\_\_\_  
GDA \_\_\_\_\_  
DBM/DBM ASST \_\_\_\_\_  
LEO \_\_\_\_\_  
TIMBER \_\_\_\_\_

# Letter 8

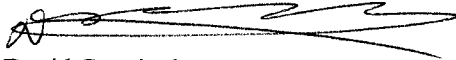
**David Cunningham  
05 Miners Creek  
Frisco, CO 80443**

To Whom It May Concern:

8-1

I have read the Environmental Assessment and I am concerned with a very specific part. In section 3.4.4, WR-5 is a "potential mitigation" that requires the testing of intercepted groundwater. It is clear in the EA that intercepted water will be contained and shipped off-site for proper disposal, so why require the testing of that water? Isn't that a little like requiring one to analyze the contents of their kitchen garbage can before it is sent to the landfill? It seems to be an unnecessary mitigation that adds cost to the exploration that we should encourage in these times of tight natural gas supply. Front page articles in the Denver Post and New York Times today (6/17) re-emphasize the need for us to explore our domestic natural gas supplies.

Thank you for your consideration,



David Cunningham

**PAONIA RANGER DISTRICT  
ACTION DATE**

JUN 19 2003

DISTRICT RANGER \_\_\_\_\_  
MINERALS LM  
LANDS/ENG \_\_\_\_\_  
RANGE \_\_\_\_\_  
WILDLIFE \_\_\_\_\_  
CEA \_\_\_\_\_  
DEM/DEM ASST \_\_\_\_\_  
CFO \_\_\_\_\_  
OTHER \_\_\_\_\_

## Letter 9

2325 Elderberry Court  
Grand Junction, CO 81506  
June 17, 2003

Project Manager  
GEC Exploration Drilling Project  
P.O. Box 1030  
Paonia, CO 81428

9-1

I have reviewed the Environmental Assessment dated May 2003 for the Gunnison Energy Corporation's proposed drilling project and believe all possible aspects have been thoroughly discussed.

Natural gas is a very clean burning fuel that can be produced with a minimum of surface disturbance and requires very little refining prior to use. The government, at all levels, must encourage proper development of this valuable resource.

I hope the drilling proposal can move ahead without delay.

Sincerely,

*Joe G. Barnes*

Joe G. Barnes

**PAONIA RANGER DISTRICT  
ACTION** **DATE**

JUN 18 2003

DISTRICT RANGER \_\_\_\_\_  
MINERIALS *LM* \_\_\_\_\_  
LANDS/ENG \_\_\_\_\_  
RANGE \_\_\_\_\_  
WILDLIFE \_\_\_\_\_  
GDA \_\_\_\_\_  
DBM/DBM ASST \_\_\_\_\_  
LEO \_\_\_\_\_  
TIMBER \_\_\_\_\_

# Letter 10

June 17, 2003

Project Manager  
GEC Exploration Drilling Project  
Paonia, Colorado 81428

Dear Project Manager:

10-1 In the Environmental Assessment prepared by the Forest Service and the BLM in response to GEC's proposed exploratory gas project of 8 wells, the truck traffic alone is staggering. This traffic would be noisy, would cause terrible congestion on the highways and roads, and would be a potential safety hazard on all roadways.

10-2 I am very concerned about the risks to our water sources. What we need is a responsible authority to state that water will not be impacted, and if that cannot be guaranteed - then no drilling. Once the water is contaminated or gone due to fracturing, it will be too late.

10-3 Added to the above concerns are the realization that the beauty of anywhere from 113,727 acres to 169,195 acres, or more, will be destroyed.

Without water that is free from contamination and depletion, real problems will begin.

Sincerely,

Donald F. Taylor

3959 P Road

Paonia, CO 81428-9774

PAONIA RANGER DISTRICT  
ACTION DATE

JUN 19 2003

DISTRICT RANGER  
MINERALS LM  
LANDS/ENG  
RANGE  
WILDLIFE  
GDA  
GDM/DBM ASST  
CEO  
TIM

# Letter 11

PAONIA RANGER DISTRICT  
ACTION DATE

JUN 18 2003

DISTRICT RANGER  
MINERALS ☒ LM  
LANDS/ENG  
RANGE  
WILDLIFE  
GDA  
PBM/DBM ASST  
LEO

Paul H. Techoepe  
P.O. Box 974  
Paonia, Colo.

To the project manager (GEC Exploration  
drilling project):

11-1

I don't want the proposed project  
of 8 exploratory gas wells. Stevens  
Gulch road is a nice place to go.

11-2

I ~~for~~ drill for methane gas up there  
it will destroy the peacefulness.  
I don't want the big truck traffic!

Paul H. Techoepe

# Letter 12



"TJ McIntyre"  
<tjmcintyre@whitewa  
ve.com>

To: <lmattson@fs.fed.us>  
cc:  
Subject: gas well updates

06/17/2003 04:44 PM

Liane-

12-1 [ As a homeowner south of Crested Butte, and a victim of methane bed development (my well has methane, and the filtration system costs me an arm and a leg), I want to request that you oppose any further development of coal beds in the Gunnison Valley. The development is ugly, it affects the views (development traffic plus extraction), and it's horrible for the water supply.

12-2 [ CO will be a destination for Americans for many decades to come. Let's insure that our legacy is one which considered future generations and insured that the beauty we all experience today will be enjoyed just the same by futures Coloradoans.

Sincerely,

T.J. McIntyre  
550 Lower Highlands  
Crested Butte, CO

# Letter 13

D E A N K . M O F F A T T    ☐    A I A    ☐    A R C H I T E C T

June 18, 2005

Project Manager  
GEC Exploration Drilling Project  
P.O. Box 1030  
Paonia, CO 81428

RE:            Forest Service EA

Dear Sir or Madam:

The EA is totally inadequate. Here are my comments:

- 13-1 ☐ 1. Why have you not done an EIA? Who is to blame for letting you get by with an EA?
- 13-2 ☐ 2. It's a shame the EA deals only with Forest Service land when most of the impacts will be to adjacent lands and communities.
- 13-3 ☐ 3. There are no safeguards in place to mitigate off-site impacts, except maybe the little bond GEC put up for haul routes.
- 13-4 ☐ 4. The WWE report is inadequate. Its scope is too narrow. They used pre-existing data supplied by GEC. They were told what to say to repair the damage done by the previous consultants.
- 13-5 ☐ It is very clear to me this EA is a sham. It's a put up job by the Forest Service bosses in Washington in league with the GEC.

Sincerely,



Dean K. Moffatt

**PAONIA RANGER DISTRICT  
ACTION                      DATE**

JUN 20 2003

DISTRICT RANGER \_\_\_\_\_  
MINERALS \_\_\_\_\_  
LANDS/ENG \_\_\_\_\_  
RANGE \_\_\_\_\_  
WILDLIFE \_\_\_\_\_  
GDA \_\_\_\_\_  
ADMIN/DEM ASST \_\_\_\_\_  
LEO \_\_\_\_\_  
TIMBER \_\_\_\_\_

# Letter 14

Wendy Stewart-Moffatt  
P. O. Box 2009  
Glenwood Springs, CO 81602  
(970) 945-4468  
fax 945-2203

PAONIA RANGER DISTRICT  
ACTION \_\_\_\_\_ DATE \_\_\_\_\_

June 18, 2003

JUN 20 2003

Project Manager  
GEC Exploration Drilling Project  
PO Box 1030  
Paonia, CO 81428

DISTRICT RANGER \_\_\_\_\_  
MINERALS \_\_\_\_\_  
LANDS/ENG \_\_\_\_\_  
RANGE \_\_\_\_\_  
WILDLIFE \_\_\_\_\_  
CDA \_\_\_\_\_  
DBM/DBM ASST \_\_\_\_\_  
LEO \_\_\_\_\_  
TIMBER \_\_\_\_\_

RE: Forest Service EA

Dear Sir or Madam:

I have reviewed the Environmental Assessment prepared by the Forest Service and must respond.

14-1 [ First of all, I was disturbed that you have not produced an Environmental Impact Statement which would be a much more comprehensive study of the actual impacts that will certainly come from coal bed methane drilling.

14-2 [ Although there are many statistics regarding proposed drilling, most of the impacts will be off Forest Service property. The traffic, downstream water contamination, smell from flaring, dust and noise to name a few, will be borne by the residents in proximity to the wells. The largest remaining impact for the government will be the hideous scars that will never heal.

14-3 [ Gunnison Energy's proposed drilling will have impacts far beyond your report. They must be accountable. They propose to ruin land, water and the peace that most have moved north of Cedaredge to find. My family's property north of U50 Road will be  
14-4 [ severely impacted. Are there safeguards in place to hold Gunnison Energy accountable?  
14-5 [ Have you considered what hours of the day these trucks will travel? What about an emergency program for accidents and spills? Who will be monitoring that?

14-6 [ Regarding the report done by Wright Water Engineers, weren't they paid with corporate funds to produce results that favor Gunnison Energy? Do you just accept that, no questions asked? I don't! My family's property is directly downstream from the wells proposed north of Cedaredge. It is not acceptable to me to roll over and play dead because those doing the drilling have paid a water engineering company to report what they want people to read! An independent water analysis MUST be done before any drilling is allowed!

## Letter 14 Continued

14-7

Western Garfield County hosts drilling and scars that are gruesome, noisy, contaminating, smelly and can never heal. Your interests in Delta County deserve the closest scrutiny possible. Do not allow any drilling to proceed without a complete Environmental Impact Statement and especially an unbiased water analysis.

Sincerely,

A handwritten signature in black ink that reads "Wendy Stewart-Moffatt". The script is cursive and fluid, with the first name "Wendy" being more prominent and the last name "Stewart-Moffatt" following in a continuous line.

Wendy Stewart-Moffatt

# Letter 15

Rob Thurman  
1145 Hastings Street  
Delta, CO 81416  
970-874-9488

June 18, 2003

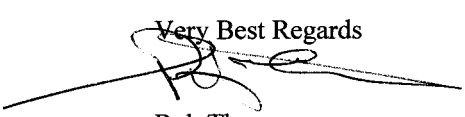
Project Manager  
GEC Exploration Drilling Project  
P. O. Box 1030  
Paonia, CO 81428

Project Manager,

Thank you for providing this opportunity to comment on Gunnison Energy's Environmental Assessment.

15-1 I am pleased that the summary states: "none of the eight proposed natural gas wells should measurably impact groundwater resources" (3.4-24). Additionally it is stated under Cumulative Impacts that "the proposed wells would not add incremental effects to groundwater quality or quantity within the cumulative effects area because of low permeability of the formations and spatial distance between wells" (3.4-25-26). I  
15-2 believe the Potential Mitigations Measures listed under 3.4.4 are excessive given the potential of impact. The measures under WR-5, 6 and 12 seem especially burdensome for an exploration program. Energy exploration should be encouraged, not stifled by admittedly unnecessary mitigations.

Very Best Regards

  
Rob Thurman

PAONIA RANGER DISTRICT  
ACTION DATE

JUN 20 2003

DISTRICT RANGER \_\_\_\_\_  
MINERALS \_\_\_\_\_  
LANDS/ENG \_\_\_\_\_  
RANGE \_\_\_\_\_  
WILDLIFE \_\_\_\_\_  
GDA \_\_\_\_\_  
OBM/DBM ASST. \_\_\_\_\_  
LEO \_\_\_\_\_  
TIMBER \_\_\_\_\_

# Letter 16

PAONIA RANGER DISTRICT  
ACTION DATE

JUN 20 2003

June 18, 2003

Project Manager  
GEC Exploration Drilling Project  
PO Box 1030  
Paonia, CO 81428

DISTRICT RANGER \_\_\_\_\_  
MINERALS \_\_\_\_\_ ✓  
LANDS/ENG \_\_\_\_\_  
RANGE \_\_\_\_\_  
WILDLIFE \_\_\_\_\_  
GDA \_\_\_\_\_  
BBM/DEP \_\_\_\_\_  
LEO \_\_\_\_\_  
TIMB \_\_\_\_\_

RE: Environmental Assessment, May 1003

Dear Sir or Madam:

Following are my comments regarding the above reference assessment.

- 16-1 [ It is clear that this Assessment falls well short is addressing all of the concerns/issues when contemplating such drilling activity on Grand Mesa. The Assessment contains many inaccuracies; such as referring to non-existent tables, inconsistencies in statements, and contradictory statements. For example, when dealing with the issue of water disposal, the Assessment calls for water to be ... transported to a certified disposal facility using a route other the SH 65. See Table 2-6." There is no alternative route for the Surface Creek Valley without using SH65! On Page 2-52 it is mentioned that there are no regulations to regulating the amount of fracing fluids used, but previously addressed is suggested that the quantity be regulated! Table 3.10-2 estimates the area of visibility of wells pads, but the totals of the columns are added incorrectly. In fact, the numbers listed in the table don't correlate to the numbers listed in the following Site-Specific Impacts when each location is discussed. Lastly, the Assessment unequivocally states the ground water "... will not be impacted..." but in the same paragraph goes on to state that "... it is not expected that hydrofracturing effects will extend beyond 500 feet..." These contradictions and errors (and there's more) all clearly show that this Assessment is flawed and inaccurate. Therefore, a complete EIS should be completed.
- 16-2 [
- 16-3 [
- 16-4 [
- 16-5 [ In the event that an EIS is not completed, and this Assessment is determined to be sufficient, I strongly suggest the no exceptions to normal Forest Service rules/policies be granted to GEC. There are no compelling reasons for the exceptions listed in the Assessment. Obviously, the FS has rules and procedures. I assume that they were formulated for good reason and the Assessment does not state any reason for any exception. Therefore, I ask that no exception be granted.
- 16-6 [ I would suggest that the travel routes be altered. The Surface Creek Valley route, coming north n SH 65, should be altered so that traffic to the sites come up and over the Mesa from I-70, to SH 65, and then to Forest Service roads. The burden of supervising traffic, the safety risk, should be borne by as few as possible, not shared disproportionately. Traveling through one county (Mesa County) and then onto FS ground makes considerably more sense than traversing through an additional county. There's new construction on SH50 and the heavy use of Delta County U50 road places a great burden on those residents along the route as well as the Delta County Sheriff. It seems reasonable to shift as much on the traffic burden to those who have manpower to police (Mesa

## Letter 16 Continued

16-6


County) and those who have vast experience in dealing with traffic and other related drilling issues (Forest Service).

16-7

Lastly, the Assessment mentions that many surveys, reports, mitigation efforts be completed. Such surveys as bird surveys, insect and disease surveys, and growing surveys are all necessary and should be completed before any drilling is approved or commenced.

I trust that you will give weight to my concerns, as well as those of others.

Sincerely,



Edward J. Baxter  
1869 2375 Road  
Cedaredge, CO 81413

# Letter 17

Loretta L. Molitor  
1865 2425 Drive  
Cedaredge, CO 81413  
970 856-4680 Email:lor2mol@aol.com

June 18, 2003

Project Manager  
GEC Exploration Drilling Project  
PO Box 1030  
Paonia CO 81428

Connie Clementson  
Forest Supervisor, Grand  
2250 Hwy 50  
Delta CO 81416

PAONIA RANGER DISTRICT  
ACTION DATE

JUN 20 2003

DISTRICT RANGER  
MINERALS WA  
LANDS/ENG  
RANGE  
WILDLIFE  
GDA  
Mesa National Forest  
LEO  
TIMBER

RE: Comments on *Environmental Assessment Gunnison Energy Corporation's Proposed  
Exploratory Gas Drilling Project* with specific reference to Leon Lake Well #4 and  
Leon Lake Well #5

17-1 After reviewing the Environmental Assessment for the drilling of "exploratory" gas wells  
on the Grand Mesa by GEC I see that both Leon Lake #4 and Leon Lake #5 require exceptions  
to COGCC rules regarding well development (2-2) especially as they apply to protection of  
17-2 surface water resources (2-35-37). No compelling arguments for either the siting of these wells  
or for allowing exceptions in these cases are presented. Simple assurances about mitigating  
erosion and sediment transport and low likelihood of spills of toxic drilling materials and waste  
waters from fracturing (3.4 pp 15-17) do not GUARANTEE that the domestic and agricultural  
water users downstream on Surface Creek will be protected. While the present sites were chosen  
over those earlier proposed (apparently due to steep slope consideration although this reader did  
17-3 not find that specific reference in this report) the fact is that both areas are designated NOS.  
According to your glossary this would require access through directional drilling from a non  
NOS site (6-4). This does not appear in the proposal. My familiarity with the Surface Creek  
drainages suggests that, in fact, no such site could be found.

17-4 I understand that the major reason COGCC exists is to promote production of energy  
resources and regulate the construction of the well bores but with no responsibility to the place  
or people affected by production activities. I also understand that the USFS is under pressure  
17-5 from the present administration to facilitate the development of resources on public lands. Does  
this require ignoring the highly likely endangerment of property values, health, and livelihoods  
in the area of Cedaredge and the Surface Creek Valley?

17-6 At the very least the drilling of Leon Lake #5 should be disallowed since discharge from  
this site would flow directly into a tributary of Surface Creek. The stream may be ephemeral but  
when it runs it currently carries a fair amount of clear, unsilted water at a rather rapid flow rate  
17-7 directly into Surface Creek. It's unfortunate that your survey teams viewed this area only during  
one of the worst drought years on record. Access road development for Leon Lake #4 also  
presents a major hazard of siltation in Surface Creek. Unnatural sediment loads can easily effect  
17-8 the operation of irrigation out-take systems as well as increased demands on the filtration  
systems of the domestic water-user systems down stream. Assurances from the developers and  
17-9 the agencies backing them to "minimize" impacts (note that at least no one promises "no  
impacts") are hollow promises if not accompanied by adequate policing measures and a clear

## Letter 17 Continued

17-9 | redress on the part citizens and communities affected. Current bonding levels are woefully  
17-10 | inadequate to even begin to repair or replace the filtration systems of the Cedaredge  
City water treatment facility and the new facility to be built by the Upper Surface Creek Domestic  
Water Users Association.

17-11 | As annoying and expensive as simple sediment pollution could be, the potential  
problems of spills of drilling compounds and brackish waters into the creek are too great to be  
dismissed by promises that the drilling company will comply with the law. (3.2-3) If the first  
indication a rancher has of chemical pollution of his soils by contaminated irrigation water is the  
grass dying in his pastures, what can he do? Lest one think this is merely an appeal to emotion I  
suggest reviewing what has been happening in both the Powder River Basin in Wyoming and in  
the region around Aztec, New Mexico. To say that these two examples involve a different set of  
variables than what exist here on the Grand Mesa too easily dismisses the fact the much of the  
materials, processes, and traffic/road construction issues are the same in any heavy industrial  
development.

17-12 | I read with great interest the comments on the factors that determine well spacing for both  
exploration and development. It was not surprising that the reasons for the relatively close  
spacing of three "exploration" wells (Leon Lake #2, #4, and #5) were not explained except to  
note that if the reasons were related to geology the information was likely to be proprietary and  
not available to the public. Can we assume that the permitting agency has a right to this  
information? If not, how do we know that the siting of wells is based on assessing the gas  
producing potential of the area? If the area is promising these extra wells would then position  
17-13 | GEC for more rapid turnover to production wells with an argument for permitting based on the  
fact that the wells are already there. This would also facilitate argument for the construction of  
pipelines and compressor stations connecting these three conveniently closely situated wells.  
Piecemeal permitting processes without long range planning involving many alternative "What  
If.." scenarios is a road to destruction for the forest. The process by which agencies simply  
17-14 | "consider projects when proposed" is seriously flawed. Refusal of GEC or the USFS to consider  
the total Leon Lake leasing area in making permitting decisions is ludicrous (p. 2-55). I assume  
17-15 | that GEC as an off shoot of an older successful company (Oxbow Mining) has, in fact, done  
much of this kind of planning. (Despite disclaimer at top of p. 2-54). We do know that there was  
17-16 | natural gas flow detected in the sandstones above the coals in the original drilling of Leon Lake  
#2. If GEC is really simply interested in assessing the potential of this field, i.e. drilling for  
exploration purposes, why isn't the reopening and deeper drilling and hydro-fracturing of that  
well sufficient?. The placement of all three Leon Lake wells so far proposed (#2, #4, and #5)  
17-17 | represents investigation of sandstone and coal beds at approximately the same depths and the  
same distances from the outcrop. Surely the expertise and experience of the professionals at  
GEC could make reasonable estimates for production and the difficulties and expenses involved  
from ONE of these wells. The reopening and extended drilling of Leon Lake #2 as already  
permitted should be adequate.

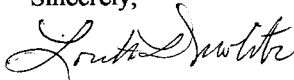
17-18 | The EA poorly addresses the problems engendered by the development of access roads.  
Forest Service Road 127 is currently adequate for hunters, hikers, horse riders, ranchers,  
17-19 | fishermen, and ATV riders. However, it will need extensive "improvement" for heavy truck  
traffic. That construction and subsequent traffic will make the road unuseable or at least very  
17-20 | dangerous for all the traditional users except possibly snow mobilers when operations are shut  
down for the winter. Cattle on the grazing allotments in the area will also be endangered. Unlike

## Letter 17 Continued

17-21 [ logging, this is a violation of the multiple use rule for National Forests in that these areas will  
effectively be closed to any other users except GEC. Unless these wells prove that the potential  
17-22 [ for economic recovery of natural gas from the sandstones and coals is not possible the effective  
closure of areas to traditional uses will continue and spread. This effective closing of a National  
Forest will be aided and abetted by the episodic permitting process noted earlier.

17-23 [ The siting of Leon Lake #4 and #5 on slopes that drain into a major surface water  
resource with extensive removal of vegetation and road development in an area so successfully  
dedicated to the multiple use mission of the National Forests can only be regarded as a man made  
disaster for the Grand Mesa National Forest, traditional users of these public lands, and citizens  
of western Colorado.

Sincerely,



Loretta L. Molitor

cc. lmattson@fs.fed.us

Rep. Scott McGinnis

Dale Bosworth, Chief of the U.S.F.S.

# Letter 18



SKAnic5@aol.com

06/20/2003 01:10 PM

To: lmattson@fs.fed.us

CC:

Subject: GEC Exploration Drilling Project

June 18th, 2003

Project Manager

GEC Exploration Drilling Project

Box 1030

Paonia, CO 81428

Dear Forest Service Manager:

I would like to take this opportunity to make some ~~comments on the GEC~~ exploratory wells.

I became interested in this project because of the newspaper articles claiming potential damage to Delta's water supplies. My nature is to have concerns regarding any project that can affect water quality.

18-1

The opponents to natural gas exploration made a big deal about how drilling for natural gas will contaminate our water. I listened to the argument and started following the issue. Gunnison Energy responded by commissioning base line water studies to provide science to the discussion of water quality. The Delta County Commissioners hired the Colorado School of Mines to confirm the water study's conclusions. The experts seem in agreement the exploratory wells will have no impact on water.

Now I am pleased to see the EA states no impact to water quality, consistent with all the independent water analysis.

18-2

The opponents to exploration are still clamoring about water quality and spreading fear against the project without any facts and I am tired of it. I am confident water will not be an issue.

I realize, as a nation, we need more sources of natural gas. I was not originally a supporter, but after doing some homework I support approval of all 8 wells. I appreciate all your efforts and work on the extensive EA report.

Sincerely,

Beck Raney,

Grand Junction

**PAONIA RANGER DISTRICT  
ACTION**

**DATE**

**JUN 20 2003**

**DISTRICT RANGER**

**MINERALS** LM

**LANDS/ENG**

**RANGE**

**WILDLIFE**

**GDA**

**DBM/DBM ASST**

**LEO**

**TIMBER**

# Letter 19



"sarah thurston"  
<sthurston1@hotmail.  
com>

06/18/2003 09:23 AM

To: lmattson@fs.fed.us  
cc:  
Subject: Gunnison Energy Comment

Project Manager  
GEC Exploration Drilling Project  
lmattson@fs.fed.us

Dear Project Manager:

I would like to express my support for the exploration project proposed by Gunnison Energy.

I would like to highlight three reasons for support:

- 19-1 [
- 1) The project is consistent with the President's Energy Plan
  - 2) The EA list no significant environmental impacts
  - 3) The Country is in need of more Natural Gas supplies as noted in numerous articles in state and national newspapers- If we start explorations now, perhaps these shortages will not be a problem in 10 years

Thank you for the opportunity to comment. I hope you will approve all eight exploratory wells quickly and cost effectively for Gunnison Energy.

Sincerely,

Sarah Thurston  
1053 Pine Street #B  
Boulder, CO 80302

---

STOP MORE SPAM with the new MSN 8 and get 2 months FREE\*  
<http://join.msn.com/?page=features/junkmail>

## Letter 20



"Daniel Diekmann"  
<daniel\_diekmann@h  
otmail.com>

06/18/2003 10:00 AM

To: lmattson@fs.fed.us  
cc:  
Subject: Gunnison Energy Environmental Assessment

Dear Project Manager

20-1

I apologize for commenting on the Gunnison Energy Environmental Assessment via E-mail, but it appears the time to comment is almost up and I want to make sure my comment is considered. Please go ahead with the exploration drilling as proposed and consider limiting any further mitigation due to the fact that no/minimal impacts are expected. Gunnison has a right to explore their leases without unneeded & costly mitigations.

Thank You,

Daniel Diekmann  
1062 Lafayette St. Unit F  
Denver, CO 80218

Add photos to your e-mail with MSN 8. Get 2 months FREE\*.